

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

DAVID KAUFMAN,  
a/k/a "David Khalifa,"  
a/k/a "John Morray,"  
a/k/a "Big Man,"

Defendant.  
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: STIPULATED PROTECTIVE ORDER  
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20 Cr. 577 (NSR)  
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WHEREAS, the Government has identified certain discovery materials pursuant to Federal Rule of Criminal Procedure 16 which contain and/or reflect personal identifying information for victims or witnesses of the charged offenses or information concerning matters not related to the charged offenses (the "Protected Materials");

WHEREAS, disclosure of the Protected Materials to third parties could, among other things, implicate the safety and privacy rights of others and impede ongoing investigations;

WHEREAS, in the interest of expediting the discovery process, DAVID KAUFMAN, a/k/a "David Khalifa," a/k/a "John Morray," a/k/a "Big Man," the defendant, by his attorney, Michael Burke, Esq., consent to the entry of this Order;

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

The Protected Materials shall be used by the defendant, his counsel, and his counsel's agents only for

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DATE FILED: 11/17/2020

purposes of defending the charges, in connection with sentencing, and pursuing any appeals, in this criminal action. To the extent the Protected Materials are shown to additional persons consistent with the terms set forth below, those additional persons may use the Protected Materials only in connection with this criminal action.

2. The Government will mark all items subject to this protective order in a manner indicating their protected status.

3. The Protected Materials and the information and identities contained or disclosed therein:

(a) Shall be used by the defendant or his counsel only for purposes of this action;

(b) Shall not be disclosed in any form by the defendant or his counsel except as set forth in paragraph 3(c) below;

(c) May be disclosed only by the defendant's counsel and only to the following persons (hereinafter "Designated Persons"):

(i) investigative, secretarial, clerical, paralegal and student personnel employed full-time or part-time by the defendant's attorneys;

(ii) independent expert witnesses, investigators or advisors retained by the defendant in connection with this action; and

(iii) such other persons as hereafter may be authorized by the Court upon such motion by the defendant; and

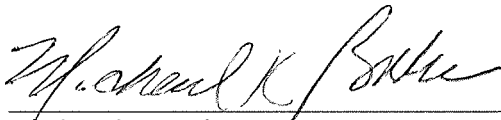
(d) Shall be returned to the Government following the conclusion of this case.

4. The defendant and his counsel shall provide a copy of this Order to Designated Persons to whom the Protected Materials are disclosed pursuant to paragraphs 3(c)(i), (ii) and (iii). Designated Persons shall be subject to the terms of this Order.

5. Attorney(s) for defendant DAVID KAUFMAN, a/k/a "David Khalifa," a/k/a "John Morray," a/k/a "Big Man," ("Defense Counsel") shall receive any materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure that are marked "Attorney's Eyes Only" on an attorney's eyes only basis, and Defense Counsel shall not share these Protected Materials or the contents of the Protected Materials with any other persons, including the defendant, except for any paralegal or staff employed by Defense Counsel.

6. The provisions of this Order shall not be construed as preventing the disclosure of any information in any motion, hearing, trial, or sentencing proceeding held in this action or to any judge or magistrate of this Court in connection with the above-captioned matter.

AGREED AND CONSENTED TO:



Michael Burke, Esq.  
Attorney for David Kaufman

11/11/20  
Date

SO ORDERED:



THE HONORABLE NELSON S. ROMÁN  
UNITED STATES DISTRICT JUDGE

11/17/2020  
Date